

# **EXHIBIT #4**

CASE#1763550 CRT#183

p2

THE STATE OF TEXAS  
VS.

SPN: 02473670

DATE PREPARED: 03/22/2022

D.A. LOG NUMBER: 2822288  
CJIS TRACKING NO.:  
AGENCY:HPD  
O/R NO: 036265422  
ARREST DATE: TO BE

NCIC CODE: 1314 21

RELATED CASES: SD 2 FEL

FELONY CHARGE: Aggravated Assault - Family Member

CAUSE NO:  
HARRIS COUNTY DISTRICT COURT NO:  
FIRST SETTING DATE:COURT ORDERED BAIL: TO BE SET AT  
MAGISTRATION  
PRIOR CAUSE NO:  
CHARGE SEQ NUM: 1

## IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **JALEN RANDLE**, hereafter styled the Defendant, heretofore on or about **March 19, 2022**, did then and there unlawfully, intentionally and knowingly threaten Valarie Gonzales, hereafter styled the Complainant, a person with whom the Defendant had a dating relationship, with imminent bodily injury by using and exhibiting a deadly weapon, namely, a firearm.

Before the commission of the offense alleged above, on June 11, 2015, in Cause No. 1435634, in the 176th District Court of Harris County, Texas, the Defendant was convicted of the felony offense of Evading in a Motor Vehicle.

## Probable Cause

Affiant, M. Dusablon, is a certified peace officer employed with the Houston Police Department. Affiant believes and has reason to believe that Jalen Randle DOB [REDACTED] hereafter Defendant, committed the felony offenses of Aggravated Assault Family Member, Felon in Possession of Firearm and Evading Arrest in a Motor Vehicle on or about March 19, 2022 in Harris County, Texas. Affiant's belief is based on the following facts:

On 3/19/2022, Officer M. Dusablon and partner Officer T. Harris, riding uniform patrol unit 9C10N, were dispatched to an assault in progress call at the residence of [REDACTED] Texas at approximately 2237 hours on 3/19/2022. My partner and I arrived to the location at approximately 2241 hours with our body worn cameras (BWC) activated. My partner and I were notified by our dispatcher that the Assault was now taking place in the parking lot of 1422 Ledwicke St., Houston in Harris County, which is located just east of the location. My partner and I received an update from our dispatcher that the Assault was occurring inside of a Black SUV. My partner and I got into our patrol vehicle and drove to 1422 Ledwicke. I observed a female later identified as Complainant Valarie Gonzales, who I find to be a credible and reliable person, sitting in the parking lot of 1422 Ledwicke St. with several items scattered around her and to be crying profusely. My partner and I observed a black Mitsubishi Outlander SUV, bearing TXLP#PBF9120 pulling away from where the Complainant was sitting. My partner and I proceeded to follow the vehicle to make contact. My partner and I initiated our emergency equipment and attempted to perform a traffic stop on the vehicle. A male, later identified as Defendant Jalen Randle DOB [REDACTED] who was the sole occupant of the motor vehicle, exited the parking lot and proceeded southbound on Ledwicke St. Defendant Randle refused to stop, turning on Josie St and proceeding eastbound on the 8600 block of Josie St. Defendant Randle then exited the driver's side door of the vehicle. Defendant Randle then continued evading from Affiant and Officer Harris on foot towards the residence of 8643 Josie St. My partner and I pursued Defendant Randle on foot announcing that we are police and for him to stop. Defendant Randle jumped the backyard fence at the residence of [REDACTED] My partner and I lost sight of Defendant Randle and were unable to place him into custody. We located a fully loaded Glock .40 caliber handgun on the driver's side floorboard of the black Mitsubishi Outlander SUV vehicle.

My partner and I then met with Complainant and gathered her information and statement. Complainant stated that she received word that her child was sick tonight and she wanted Defendant Jalen Randle, with whom she has a dating relationship, to take her to see her child. Complainant stated that she arrived to Defendant Randle's residence [REDACTED] and called him several times but he was asleep. Complainant stated that Defendant Randle finally woke up and became irate with her because all he wanted to do was sleep. Complainant stated that the Defendant Randle proceeded to strike her with a closed fist to her face several times and then placed both hands around her neck applying pressure impeding her breathing for approximately 10 seconds. Complainant stated that she attempted to run out the front door of the residence but Defendant Randle grabbed her by her hair preventing her from exiting the residence. Complainant stated that Defendant Randle continued to strike her in the face with a closed fist a few more times, causing pain. Complainant stated that as Defendant

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Randle was choking her he stated, "Stop crying, I'll shoot you with my gun." Complainant stated that she was in fear for her life and thought she was going to die. Complainant stated that Defendant Randle proceeded to pack up all of her belongings and placed her belongings inside his friend's black SUV. Complainant stated that Defendant Randle told her to get inside the vehicle and he would drop her off somewhere. Complainant stated that the Defendant Randle drove her to the parking lot of 1422 Ledwicke St., Houston in Harris County, Texas (J. Robinson Sr. Community Center.) Complainant stated that she called 911 and then Defendant Randle pointed a black pistol at her face and said he would shoot her if the police come. Complainant stated that Defendant Randle threw all of her items out of the vehicle and he drove away when officers arrived to the location. Complainant stated that the pistol that Defendant Randle pointed at her was a black handgun and was the only gun inside the vehicle. Complainant stated that she has been in a dating relationship with Defendant Randle for approx 3 weeks. Complainant stated that she wants to press charges on Defendant Randle.

I ran Jalen Randle on my computer and found his TXID [REDACTED] photograph. I presented the Complainant the TXID [REDACTED] photograph of Defendant Jalen Randle DOB [REDACTED] and she confirmed defendant's identity.

Officers took photographs of Complainant's injuries on scene. Officers completed a strangulation form on scene.

Affiant confirmed via defendant's criminal history (SPN 02473670) that defendant is currently on felony deferred adjudication in Harris County, Texas 176th DC for Evading in a Motor Vehicle and has a prior felony conviction for Evading in a Motor Vehicle. Further, defendant is a convicted felon prohibited from possessing a firearm to include the following prior felony conviction in Harris County, Texas: Possession of a Controlled Substance (4g-200g) in Cause 1444066 in the 176 District Court on June 11, 2015. My partner and I contacted the Harris County District Attorney's Office and spoke to ADA T. Rockrise who accepted felony charges for Aggravated Assault with a Deadly Weapon, Felon in Possession of Firearm and Evading Arrest in a Motor Vehicle.

# AGAINST THE PEACE AND DIGNITY OF THE STATE.

Signed and sworn by me on 3/21/22

Duly attested by me on 03/22/2022

AFFIANT

Ruth Anne Burton  
03479320

Assistant District Attorney  
Harris County District Attorney's Office  
TBC No.

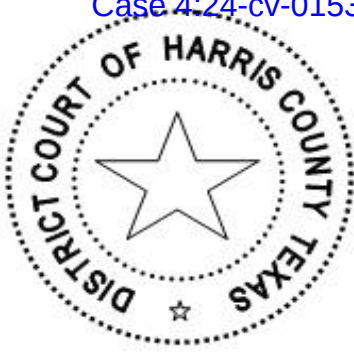
Taylor Forsythe  
Witness (Peace Officer)  
Taylor Forsythe [REDACTED]  
Witness Printed name & Badge or Payroll number

COMPLAINT

**FILED**  
Marilyn Burgess  
District Clerk

MAR 22 2022

Time: 0837  
Harris County, Texas  
By: AB  
Deputy



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this June 28, 2024

Certified Document Number: 101011812 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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